

## EXHIBIT A

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

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CHINA THREE GORGES PROJECT CORPORATION, :

Petitioner, :

-against- :

ROTEC INDUSTRIES, INC., :

Respondent. :

: Case No. 04-1510 JJF

: **AFFIDAVIT**

STATE OF NEW YORK )

) ss:

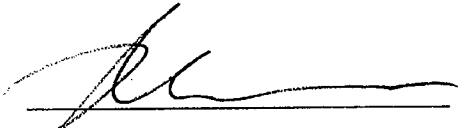
COUNTY OF NEW YORK )

Xiaomin Chen, Esq., an attorney admitted in New York, being duly sworn, deposes and affirms:

1. I am the managing partner of DeHeng Chen Chan, LLC, attorneys for Petitioner, am fully familiar with the facts of the case, and submit this affidavit in support of Petitioner's reply to Respondent's Response that Respondent filed on September 1, 2005.
2. As of today, the value of the services our legal team has provided to Petitioner in the present case, plus costs and expenses, is \$52,456.34 (excluding the charge from our local counsel for serving and filing Petitioner's present reply). Out of the \$52,456.34, \$45,019 is the value of services provided by our attorneys and supporting staff, which includes 15.65 hours I spent on this case, which is valued at \$5,477.50 at the hourly rate of \$350, 28.6 hours from Matthew C. Gruskin, Esq., which is valued at \$10,360.00 at the hourly rate of

\$350, 144.7 hours from Jing Ma, Esq., which is valued at \$28,940.00 at the hourly rate of \$200, 2.7 hours from our legal assistant, which is valued at \$229.50 at the hourly rate of \$85, and 0.24 hour from our legal secretary, which is valued at \$12.00 at the hourly rate of \$50. The costs and expenses we have incurred on behalf of Petitioner so far, which include charges from our local counsel, are \$7,437.34.

Dated: New York, New York  
September 6, 2005

  
Xiaomin Chen

Sworn to before me this  
6th day of September, 2005

Azra Kolenovic  
Notary Public

Azra Kolenovic  
Notary Public, State of New York  
No. 01K06113563  
Qualified in Kings County  
Commission Expires August 2, 2008